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10 *Attorneys for Plaintiff,*
11 *KK Real Estate Investment Fund, LLC*

12 **UNITED STATES DISTRICT COURT**

13 **FOR THE DISTRICT OF NEVADA**

14 KK REAL ESTATE INVESTMENT
15 FUND, LLC., a Nevada limited liability
16 company;

17 Plaintiffs,

18 vs.

19 DEUTSCHE BANK TRUST COMPANY
20 AMERICAS, AS TRUSTEE FOR
21 RESIDENTIAL ACCREDIT LOANS,
22 INC., MORTGAGE ASSET-BACKED
23 PASS-THROUGH CERTIFICATES,
24 SERIES 2007-QS2; WESTERN
25 PROGRESSIVE NEVADA, INC., a
26 Delaware corporation registered with the
27 Nevada Secretary of State; NEVADA
28 ASSOCIATION SERVICES,

Defendants.

Case No.: 2:17-cv-01040-GMN-GWF

**STIPULATION TO EXTEND TIME TO
RESPOND TO DEFENDANT DEUTSCHE
BANK TRUST COMPANY AND WESTERN
PROGRESSIVE-NEVADA, INC.'S MOTION
TO DISMISS**

(First Request)

IT IS HEREBY STIPULATED by and between Plaintiff KK REAL ESTATE INVESTMENT FUND, LLC, a Nevada limited liability company (hereinafter "KK Real Estate") and Defendants, DEUTSCHE BANK TRUST COMPANY AMERICAS, AS TRUSTEE FOR RESIDENTIAL ACCREDIT LOANS, INC., MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2007-QS2 ("Deutsche Bank"), and WESTERN PROGRESSIVE-NEVADA, INC., a Delaware corporation registered with the Nevada Secretary of State ("Western") (hereinafter KK Real Estate, Deutsche Bank Trust Company and Western

1 Progressive Nevada, Inc. shall be referred to collectively as the "Parties") through their respective
2 counsel of record as follows:

3 WHEREAS, Deutsche Bank and Western filed and served KK Real Estate with its Motion to
4 Dismiss on September 18, 2017.

5 WHEREAS, KK Real Estate's Opposition to the Motion is due to be filed and served on
6 October 2, 2017.

7 WHEREAS, settlement discussions began in this case in August of 2017.

8 WHEREAS, Parties need more time to discuss potential settlement and/or respond to said
9 pending motion.

10 WHEREAS, The Parties stipulate as follows:

11 IT IS HEREBY AGREED AND STIPULATED between the Parties, by and through their
12 undersigned attorneys, that KK Real Estate shall have up to and including October 16, 2017 to file its
13 Opposition to the Motion.

14 IT IS HEREBY AGREED AND STIPULATED between the Parties, by and through their
15 undersigned attorneys, that Deutsche and Western shall have up to and including October 21, 2017 to
16 file its Reply in Support of its Motion to Dismiss.

17 This is the Parties first request for an extension of time to file the Opposition to the Motion, and
18 is not intended to cause any delay or prejudice to any Party.

19 Approved as to Form and Content:

20 DATED this 5th day of October, 2017.

DATED this 5th day of October, 2017.

21 **AYON LAW, PLLC**

WRIGHT, FINLAY & ZAK, LLP

22 /s/ Luis A. Ayon

/s/Patrick J. Davis

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ORDER

Pursuant to the above Stipulation of the Parties, it is ORDERED that:

1. KK Real Estate shall have up to and including October 16, 2017 to file its Opposition to the Motion.
2. Deutsche and Western shall have up to and including October 21, 2017 to file its Reply in Support of the Motion to Dismiss.

DATED this 5 day of October, 2017.



DISTRICT COURT JUDGE